

REMARKS

Claims 1-15, and 24-33 are pending and were rejected. No claims are amended, and thus claims 1-15 and 24-33 remain pending. Claims 1 and 24 are independent claims. The other listed claims depend, either directly or indirectly, from one of these two claims. Because independent claims 1 and 24 are allowable over the cited art, it is not necessary to address the rejections of the dependent claims. Therefore, the following remarks focus on independent claims 1 and 24.

Claims 1 and 24 stand rejected under § 103(a) as being obvious over U.S. Pre-Grant Publication 2001/0042114A1 to Agraharam ("Agraharam") in view of Japanese Publication 2000-184104 to Hisayoshi ("Hisayoshi"). To establish a *prima facie* case of obviousness, the Examiner must, among other things, (1) show that one skilled in the art would be motivated to combine the references and (2) show that each element of the claims is taught by the proposed combination of references. The Examiner has failed to do either.

Each of the pending independent claims is drawn to a modular video conferencing system that includes a main unit having "a docking station adapter configured to removably couple to a docking station that connects the main unit in a communicating relationship with a video conferencing network." Among the purposes of this arrangement are adapting to different environments, upgrading components, etc. See Applicant's Specification at ¶[0002]. Additionally, Applicant's specification teaches the general undesirability of general purpose computer based video conferencing systems, including the disadvantages of lack portability, *i.e.*, the lack of an ability to transport and adapt the systems to different environments and the difficulties associated with upgrades. *Id.* Overcoming these and other issues are the motivation for providing a modular video conferencing system.

The primary reference, Agraharam, appears to disclose a general purpose personal computer based videoconferencing system. Figure 4 of Agraharam, on which Examiner principally relies, clearly shows a personal computer with connected speakers, microphone, and camera. As he necessarily must, Examiner concedes that the disclosed general purpose personal computer based videoconferencing system does not disclose, teach, or suggest a docking station adapter, and proposes Hisayoshi to supply this missing limitation. Whether or not Hisayoshi discloses the required docking station adapter is discussed below (it does not), but is largely

irrelevant, as the combination of Agraharam with Hisayoshi is clearly improper. As noted by Applicants' specification, one of the issues in prior art videoconferencing systems, especially general purpose personal computer based systems, is the complexity of upgrading the systems. Thus, one skilled in the art seeking to overcome these difficulties would not base his solution on the general purpose personal computer based systems. General purpose personal computer based systems are part of the problem, not the solution.

Furthermore, because Agraharam is based on a general purpose computer, which typically includes a variety of expansion slots, bays, etc., one skilled in the art would not seek to add a docking station adapter to such a computer because there is no reason to "dock" it with anything. Yet this is exactly what Examiner proposes by seeking to combine Hisayoshi. Although the machine translation provided is of limited intelligibility, Hisayoshi appears to disclose an adapter device 2 for connecting a mobile telephone 3 to a digital camera 1. Presumably this allows still pictures (*i.e.*, photographs) taken with the camera to be transmitted using the mobile telephone essentially as a modem.

Again, one skilled in the art of videoconferencing systems would not look to such a solution is attempting to address the problems of adapting videoconferencing devices to different environments or upgrading/expanding videoconferencing systems. First of all, the problems addressed are fundamentally different. Allowing a photographer to send images over a mobile telephone is unrelated to interfacing a videoconferencing device in a different environment or expanding/upgrading a videoconferencing system. Moreover, there is no logical reason to combine what is essentially a type of modem adapter with the general purpose PC based videoconferencing system disclosed in Agraharam. Put simply, one skilled in the art of videoconferencing would not look to either Agraharam or Hisayoshi, much less the two in combination, in designing a modular videoconferencing system.

Furthermore, even if it were proper to combine the references, they still fail to teach or suggest each and every limitation of the claims. Examiner concedes that Agraharam does not teach or suggest the required docking station adapter, and thus proposes Hisayoshi. However, Hisayoshi also fails to disclose, teach, or suggest a "docking station adapter configured to removably couple to a docking station that connects the main unit in a communicating relationship with a video conferencing network." The adapter of Hisayoshi connects a digital camera to a mobile telephone. A digital camera and a videoconferencing main unit are two

entirely different things. Similarly, the mobile telephone clearly cannot be a videoconferencing network. The proposed combination just does not provide the docking station adapter limitation.

The proposed combination also fails to teach or suggest "a camera adapter configured to removably receive a camera unit that provides audio and video signals," which is also required by the claims. Whatever Agrapharam teaches, it is clear from Fig. 4 that the camera connection is just a camera and that audio is connected to the main unit separately. Note the separate connection of microphone 47 to the main unit.

Again, the absence of this limitation is not a mere word game technicality, but a fundamental part of the nature of how the modular videoconferencing system is designed, which in turn reflects the problems to be overcome. As noted in Applicants' specification, the modular design allows the user to easily adapt the videoconferencing system to different environments and/or upgrade components, *e.g.*, the camera, in a straightforward manner. Not only do the references cited by Examiner fail to meet the literal limitations of Applicants' claims, they also fail to show any suggestion of how to achieve the objectives of such a system. Thus, not only are the cited references deficient from an anticipation perspective, but their teaching away from the claimed invention renders them unsuitable for any obviousness-based rejection.

Reconsideration of the claims in light of the above remarks and allowance of all pending claims is respectfully requested. If, after considering this reply, the Examiner believes that a telephone conference would be beneficial towards advancing this case to allowance, the Examiner is invited to contact the undersigned at the number listed.

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Date

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